SECTION 10.0 PROJECT ALTERNATIVES

CEQA Statute Section 21002.1(a) states that the purpose of an EIR is to "identify the significant effects on the environment of a project, to identify alternative to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

CEQA guidelines require an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project, and evaluate comparative merits of the alternatives" (CEQA Section 15126.6(a)). CEQA Guidelines direct the selection of alternative be focused on those alternatives capable of eliminating any significant environmental effects of the project or of reducing them to a less-than significant level, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly. In cases where a project is not expected to result in significant impacts after implementation of recommended mitigation, review of project alternatives is still appropriate.

The range of alternatives required within an EIR is governed by the "rule of reason" which requires an EIR to include only those alternatives necessary to permit a reasoned choice. The discussion of alternatives need not be exhaustive. Furthermore, an EIR need not consider an alternative whose implementation is remote and speculative or whose effects cannot be reasonably ascertained.

This alternatives discussion focuses on three alternatives: (1) the no development alternative, (2) existing land use designation alternative (commercial tourist), and (3) reduced density alternative (single family residential similar to surrounding development). Each of these alternatives is discussed below and a comparison of each alternative to the proposed project is provided in *Table 10-1, Proposed Project vs. Alternative Comparison of Environmental Impacts* at the end of this section.

10.1 NO DEVELOPMENT ALTERNATIVE

Project Description

The No Development Alternative assumes that the project would not be developed, and the project site would remain in its existing undeveloped condition. No amendments to the General Plan, EastLake III GDP and SPA would be required.

Eastlake III Senior Housing EIR

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Environmental Analysis

Land Use, Planning and Zoning

Under the No Development Alternative the project site would remain in its undeveloped condition. There would be no senior housing developed, and the optional trail and temporary emergency access road would not be constructed. There would be no conflict between the temporary emergency access road and vehicular and pedestrian traffic along Wueste Road.

Landform Alteration and Aesthetics

Implementation of the No Development Alternative would retain the same landform configuration that currently exists. The site would remain a relatively flat, graded site. Therefore, no elements would be introduced under this alternative that would detract from the existing aesthetic character. No impacts to landform or aesthetics would occur.

Agricultural Resources

No agricultural resources exist onsite. If the project site were not developed further, it is unlikely that the site could be used for agricultural uses due to the graded nature, lack of soils suitable for agricultural production and size of the site.

Biological Resources

The No Development Alternative would likely result in habitat and species recolonizing the project site. This alternative would eliminate potential impacts to narrow endemics associated with the optional trail and temporary emergency access road. No indirect impacts to resources in the MSCP Preserve would occur.

Cultural Resources

No grading or other ground disturbance would occur with this alternative. Similar to the proposed project, cultural resource impacts would not occur.

Geology and Soils

The No Development Alternative would not require grading of the site. Erosion associated with the current site condition would still occur, but erosion of newly graded areas would not occur.

Since there would be no human occupation of the site, any impacts related to geotechnical hazards would be eliminated.

Paleontological Resources

Although the proposed project would not result in impacts to paleontological resources, under the No Development Alternative no grading or other ground disturbance would occur; therefore, paleontological resource impacts would not occur.

Water Quality and Hydrology

The No Project Alternative would not result in any modifications to the existing drainage patterns or volume of storm water runoff as the total impervious area on-site would remain unchanged from its present condition. Therefore, no impacts to water quality and hydrology would occur.

Transportation, Circulation and Access

The No Development Alternative would not generate additional vehicle trips; therefore, no impacts would occur to local roadway segments or intersections.

Air Quality

The No Development Alternative would avoid the air quality impacts associated with site grading, construction, vehicular emissions and building operations. No impacts to air quality would be generated by this Alternative.

Noise

Existing ambient noise levels would remain under this alternative. Land uses surrounding the site will still continue to be subjected to noise generated by surrounding activities. However, temporary noise impacts from construction would not occur, and noise impacts from traffic on future residences would not occur under this Alternative.

Public Services and Utilities

Elimination of development on the project site would not generate additional demand for local public services and facility capacity. No public services and utility impacts would occur.

Hazards/Risk of Upset

The potential for additional hazards and the risk of upset of unknown hazards would not occur under this alternative as the site would remain undeveloped.

Project Objectives

The No Development Alternative would meet the following project objectives:

Preserve open space and natural amenities.

The No Development Alternative would not meet the following project objectives:

- Assure a high quality of development, consistent with City and Community goals and objectives, the Chula Vista General Plan and EastLake III General Development Plan.
- Create an economically viable plan that can be realistically implemented within current and projected economic conditions.
- Provide for orderly planning and long-range development of the project to ensure community compatibility.
- Establish the necessary framework for an identify financing mechanisms to facilitate adequate community facilities, such as transportation, water, flood control, sewage disposal, schools and parks and provide adequate assurance that approved development will provide the necessary infrastructure, when needed, to serve the future residents of EastLake III.
- Establish a planning and development framework which will allow diverse land uses to exist in harmony within the community.

10.2 EXISTING LAND USE DESIGNATION (COMMERCIAL - TOURIST) ALTERNATIVE

Project Description

The existing land use designation for the project site is for Commercial-Tourist uses. The Existing Land Use Designation Alternative would result in the continued development of the site for Commercial-Tourist uses. No amendments to the designation would be necessary. Since the FSEIR #01-01 addressed the development of the project site for commercial-tourist uses; the following impact characterization is a summary of conclusions from the FSEIR #01-01. In cases

where FSEIR #01-01 did not differentiate the impacts related to the specific project site and instead referred to impacts from development of the larger Woods and Vistas project, an independent analysis was provided.

Environmental Analysis

Land Use, Planning and Zoning

This alternative would be consistent with the existing General Plan and EastLake III GDP and SPA. The site would be developed with a commercial tourist use that would support the OTC. The commercial tourist use would be compatible with the surrounding existing and proposed land uses, which include residential and commercial uses. No land use, planning or zoning impacts would result from this alternative if the optional features are not implemented. If the optional temporary construction access road and trail are implemented, similar land use impacts would be associated with these features as the proposed project.

Landform Alteration and Aesthetics

Implementation of the Existing Land Use Designation Alternative would have a similar effect on landform alteration as the proposed project because the site would change from vacant land to urban development. A Commercial-Tourist use would be subject to the existing design guidelines and design review, similar to the proposed project, that would assure an aesthetically compatible structure(s). Under the existing design guidelines, the structure would remain at a maximum height of 45 feet. However, similar to the proposed project, intervening commercial uses would obstruct views of the majority of the commercial tourist structure(s) from the closest residences to the site. Therefore, landform alteration and aesthetics impacts associated with this alternative would be similar to the proposed project.

Agricultural Resources

Impacts to previous agricultural resources were addresses in FSEIR #01-01. Since the preparation of FSEIR #01-01, the project site has been graded in its entirety and therefore, agricultural resources or activities no longer occur on-site. Therefore, as with the proposed project, no impacts to agricultural resources from the Existing Land Use Designation Alternative would occur.

Biological Resources

According to FSEIR #01-01, the project site previously consisted of agricultural lands with small areas of disturbed habitat (and manufactured slopes) and disturbed coastal sage scrub. Since the preparation of the FSEIR #01-01, the project site has been graded and therefore, impacts and associated mitigation to the vegetation communities have already occurred. Therefore, development of the site with a Commercial-Tourist use would not directly impact biological resources. Indirect impacts on the adjacent MSCP Preserve would still occur with this alternative. If the temporary access road and trail to the OTC are developed with this alternative, similar impacts associated with narrow endemics would occur.

Cultural Resources

According to FSEIR #01-01, and EIR #89-09 no cultural resources that meet the significance criteria under CEQA are located within the project site or optional temporary access road or trail location areas. Therefore, similar to the proposed project, the Existing Land Use Designation Alternative would not result in impacts to cultural resources.

Geology and Soils

The Existing Land Use Designation Alternative would result in the same geotechnical impacts and require the same mitigation measures that were provided in FSEIR #01-01. Similar to the proposed project, impacts would be associated with onsite erosion and geological hazards such as seismic activity. No additional impacts would be generated by the Existing Land Use Designation Alternative. If the optional features are implemented with this alternative, similar geological impacts would occur as identified in Section 5.0

Paleontological Resources

According to FSEIR #01-01, the potential exists for paleontological resources to be located within the project site. The Existing Land Use Designation Alternative would result in similar impacts as those presented for the proposed project. The potential for impacts to occur exists with the additional grading activities that would be required from implementing future development on the project site. Mitigation measures from FSEIR #01-01 would be applicable to this project alternative.

Water Quality and Hydrology

FSEIR #01-01 concluded that construction and development of the site could cause an increase in the amount of runoff and have potentially significant hydrologic impact on downstream drainage facilities during major storm events. In addition, FSEIR #01-01 determined that the proposed diversion from the Vistas neighborhood may exceed the capacity of the existing Olympic Parkway storm drain system, which would be a significant impact if storm water runoff is not directed beyond the Olympic Parkway system to the existing Salt Creek outfalls.

Previous analysis for construction related impacts to water quality, as presented in FSEIR #01-01, indicated that impairment to receiving waters resulting from conventional construction techniques could be reduced to a less than significant level through the use of BMPs. This would be similar to the impacts generated by the proposed project.

FSEIR #01-01 also recognized that potentially significant impacts to water quality would result from increased runoff carrying pollutants into nearby water resources, particularly the Otay Reservoirs. The project analyzed under the June 2001 FSEIR was designed to divert runoff away from the reservoirs, with the exception of the manufactured slopes along the east side of the site. FSEIR #01-01 required the use potable water for irrigation and revegetation of disturbed slopes with draught tolerant plants to reduce water usage, and restricted the use of pesticides, herbicides, and fertilizers to reduce impacts to below a significant level. Based on the runoff diversion plan and BMPs proposed to reduce pollutant load, FSEIR #01-01 concluded that water quality in the Otay Reservoirs would not be adversely affected by the Vistas project. Impacts would be less than significant with implementation of mitigation measures.

Transportation, Circulation and Access

FSEIR #01-01 evaluated the traffic impacts of implementation of the EastLake III SPA in its entirety. FSEIR #01-01 assumed development of the site with Commercial Tourist uses. The generation rate for Commercial Tourist uses is 200 trips per acre of commercial development. Therefore, the Existing Land Use Designation Alternative would generate 3,660 ADT. This alternative would generate approximately 1,684 more ADT than the proposed project. If this alternative constructs the temporary access road, a similar conflict would result at the intersection with Wueste Road and the regional trail.

Air Quality

The implementation of tourist-commercial uses at the project site would generate higher traffic volumes than compared to the proposed project. Higher traffic levels will likely result in more

congestion which will in-turn contribute to the Region's current air quality non-attainment levels. FSEIR #01-01 indicated that the proposed SPA development would result in significant, unmitigable environmental impacts. This alternative would therefore result in similar significant, unmitigable air quality impacts compared to the proposed project.

<u>Noise</u>

Higher noise levels are anticipated to be generated from a Commercial-Tourist use as compared to a senior housing development. A Commercial-Tourist use, such as a hotel with restaurant and meeting spaces, would likely be very active, with a frequent turn over of guests. As noted above, the Commercial Tourist use would generate more traffic which would result in higher noise levels adjacent to Olympic Parkway. Therefore, noise impacts associated with the Existing Land Use Designation Alternative will be greater than those generated by the proposed project.

Public Services and Utilities

Potable Water. FSEIR #01-01 analyzed implementation of the EastLake III SPA in its entirety, and estimated the potable water demand for the commercial tourist use to be 33,380 gallons per day. FSEIR #01-01 concluded that the proposed Woods and Vistas project would result in an incremental increase in water consumption and place additional demands on water storage and pumping facilities. The increase in the demand for water would not have a significant impact on the ability of Otay Water District to provide service to the site, however, the impact to water storage and pumping facilities would be significant if construction of new facilities does not coincide with the project's anticipated growth. Potable water demand for the proposed project is estimated at 148,200 gallons per day, therefore this alternative would result in less water consumption than the proposed project.

Sewer. The amount of sewage anticipated to be generated by the Existing Land Use Alternative is approximately 49,500 gpd; this is almost half of what is anticipated to be generated by the proposed project (98,306 gpd). Therefore, the Existing Land Use Alternative would result in less sewage generated and would have less of an impact on sewer system than proposed project.

Police. The Chula Vista Police Department does not meet its current response times. Impacts to police services are dependent upon response times and the anticipated amount of calls based on land use type. It is assumed that commercial tourist uses would generate more calls (related to theft and burglary) than the proposed gated project, and would therefore have an increased demand for services than the proposed project.

Fire. The Chula Vista Fire Department does not currently meet the threshold standard for response times for the City. Increased response time is attributable, in part, to increased travel time, which results from responding to freeway incidents, and lower density, hilly terrain and the more circuitous non-grid nature of many streets in new residential developments in Chula Vista. Impacts to fire services should be similar to those of the proposed project.

Library Services. The development of Commercial-Tourist uses would not generate a large demand for library services as this service demand is based on new residents. The City's threshold standard is 500 gross square feet per 1,000 residents and the current estimate is approximately 451 square feet per 1,000 residents. Therefore, the Existing Land Use Alternative would not generate impacts to library services as new residents would not be directly attributable to the development of Commercial-Tourist land uses.

Solid Waste. Impacts associated with the production and disposal of solid waste were not analyzed in FSEIR #01-01 for the previously proposed commercial development. However, prior to issuance of a building permit, the City requires applicants to submit a Solid Waste Management Plan describing how at least 50 percent of solid waste generated by construction will be diverted to sources other than landfills. This requirement ensures that solid waste associated are recycled and not submitted to a local landfill. Therefore, impacts are anticipated to be similar as the proposed project.

Parks and Recreation. The development of tourist commercial uses would not generate the need of additional park and recreational needs. Impacts would be the same as those for the proposed project.

Schools. The development of a tourist-commercial use at the project site would not generate the need of additional educational facilities. Therefore, as with the proposed project, this Alternative would not result in impacts to local schools.

If the temporary access road and trail are constructed with this alternative, these facilities would not have an impact on public facilities or services, similar to the proposed project.

Hazards/Risk of Upset

There are no known sources of hazards located at the project site. The potential for hazards to occur at the project site during construction and operation of this alternative would be similar in nature to the proposed project. Hazardous materials would need to be disposed of and any remaining soil hazards remediated. Impacts related to this alternative would be similar to that of the proposed project.

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Project Objectives

The existing Zoning/General Plan Designation alternative would meet the following project objectives:

- Assure a high quality of development, consistent with City and Community goals and objectives, the Chula Vista General Plan and EastLake III General Development Plan.
- Create an economically viable plan that can be realistically implemented within current and projected economic conditions.
- Provide for orderly planning and long-range development of the project to ensure community compatibility.
- Establish the necessary framework for an identify financing mechanisms to facilitate adequate community facilities, such as transportation, water, flood control, sewage disposal, schools and parks and provide adequate assurance that approved development will provide the necessary infrastructure, when needed, to serve the future residents of EastLake III.
- Establish a planning and development framework which will allow diverse land uses to exist in harmony within the community.

The existing Zoning/General Plan Designation alternative would not meet the following project objectives:

Preserve open space and natural amenities.

10.3 REDUCED DENSITY ALTERNATIVE (SINGLE FAMILY RESIDENTIAL)

Project Description

The Reduced Density Alternative would consist of single-family residential uses that are typical of the surrounding environment. Consistent with surrounding densities, approximately 56 single-family units could be developed on the site.

Environmental Analysis

Land Use, Planning and Zoning

Similar to the proposed project, the Reduced Density Alternative would require a General Plan Amendment and amendments to the EastLake III GDP and SPA. If the optional temporary construction access road and trail are implemented, similar land use impacts would be associated with these features as the proposed project. Therefore, impacts to land use, planning and zoning would be the same as for the proposed project.

<u>Landform Alteration and Aesthetics</u>

Implementation of the Reduced Density Alternative would have a similar change in landform from a vacant site to a residential community. The scale, density and quantity of residential units would be less than the proposed project. Aesthetically, the site would resemble single-family neighborhoods to the west and north and therefore would blend better from a community character perspective compared to the proposed project. Light and glare would be introduced to the site, similar to the proposed project.

Agricultural Resources

The site has been previously graded, and no agricultural activities currently occur on-site. Development of the site with single-family units would not result in impacts to agricultural resources.

Biological Resources

Similar to the proposed project, this alternative would not have direct impacts on biological resources. However, indirect impacts on the adjacent MSCP Preserve would still occur. If the optional temporary construction access road and trail are implemented with this alternative, there would be similar impacts associated with potential narrow endemics..

Cultural Resources

According to FSEIR #01-01 and EIR #89-09, no cultural resources that meet the significance criteria under CEQA are located within the project site or optional temporary access road or trail location areas. Therefore, neither the proposed project nor the Reduced Density Alternative would result in impacts to cultural resources.

Geology and Soils

The Reduced Density Alternative would require the same geotechnical mitigation measures that were provided in FSEIR #01-01 and suggested for the proposed project. That said, this alternative would eliminate the need for basement parking excavation which is anticipated to expose unstable alluvium in the proposed project scenario.

Paleontological Resources

According to FSEIR #01-01, the potential exists for paleontological resources to be located within the project site. The Reduced Density Alternative would result in similar impacts as those presented for the proposed project. The potential for impacts to occur exists with the additional grading activities that would be required from implementing future development on the project site. Mitigation Measures from FSEIR #01-01 would therefore still be applicable.

Water Quality and Hydrology

The amount of runoff generated by this alternative would depend upon the area of impervious surfaces as compared to the proposed project. Runoff from the site could carry contaminants to the storm drain system. Similar to the proposed project, BMPs would be required to treat runoff prior to entering the storm drain system or, in the case of the southern slope, prior to entering the Lower Otay Reservoir. Similar to the proposed project and in accordance with City requirements, the volume of runoff could not increase above existing volumes. Therefore, similar water quality and hydrology impacts would be applicable to the Reduced Density Alternative.

Transportation, Circulation and Access

The Reduced Density Alternative would result in approximately 56 single-family residential units, which would generate approximately 560 ADT. This is 1,416 ADT less than what would be generated by the 494-unit senior housing project. Therefore, traffic impacts from this alternative would be less than those generated by the proposed project. It is anticipated that the level of service at the main driveway into the site would still be at unacceptable levels and would warrant a traffic signal. If the temporary construction access road is developed with this alternative, a conflict at the intersection with Wueste Road and the regional trail would result, similar to the proposed project.

Air Quality

Air quality impacts from construction related activities are anticipated to be similar to those of the proposed project; however, the duration of construction may be less than the Reduced Density Alternative. For the operational phase of the project, the Reduced Density Project would generate less ADT and therefore, less vehicular emissions. Therefore, the Reduced Density Alternative would generate less air quality impacts than the proposed project.

If the temporary access road and trail are constructed with this alternative, construction of these facilities would contribute to construction-related emission, similar to the proposed project. There would be no long-term air quality emissions associated with these features.

Noise

It is estimated that the Reduced Density Alternative would decrease noise levels primarily due to the decrease in the number of vehicles traveling to and from the site. The proposed project would generate 1,976 ADT verses approximately 560 ADT for the Reduced Density Alternative.

If the temporary access road and trail are constructed with this alternative, these facilities would not have an impact on noise, similar to the proposed project.

Public Services and Utilities

Implementation of the Reduced Density Alternative would decrease the amount of water, electricity, sewer, solid waste, police services and fire services required. However, similar to the proposed project, the applicant would be required to pay the Fee Recovery District Fee, as determined by the City Engineer, to help further offset impacts to City fire, police, emergency and other services anticipated to occur as a result of build-out of the Eastern Territories. The Reduced Density project would generate the need for 0.42 acres of parkland (3 acres/1,000 people - 2.5 people per single-family residential unit was assumed). Therefore, the amount of parkland generated by the Reduced Density Alternative would be less than that of the proposed project.

If the temporary access road and trail are constructed with this alternative, these facilities would not have an impact on public facilities or services, similar to the proposed project.

Hazards/Risk of Upset

There are no known significant hazardous resources located within the project site. Therefore, the Reduced Density Alternative would have similar impacts associated with hazards as the proposed project.

Project Objectives

The reduced density alternative would meet the following project alternatives:

- Create an economically viable plan that can be realistically implemented within current and projected economic conditions.
- Provide for orderly planning and long-range development of the project to ensure community compatibility.
- Establish the necessary framework for an identify financing mechanisms to facilitate adequate community facilities, such as transportation, water, flood control, sewage disposal, schools and parks and provide adequate assurance that approved development will provide the necessary infrastructure, when needed, to serve the future residents of EastLake III.

The reduced density alternative would not meet the following project objectives:

- Assure a high quality of development, consistent with City and Community goals and objectives, the Chula Vista General Plan and EastLake III General Development Plan.
- Establish a planning and development framework which will allow diverse land uses to exist in harmony within the community.
- Preserve open space and natural amenities.

10.4 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an EIR identify the environmentally superior alternative among all of the alternatives considered, including the proposed project. If the No Project/No Development Alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The environmental analysis of alternatives presented above and summarized in Table 10-1 indicates, through a comparison of potential impacts from each alternative to the proposed project, that the No Development Alternative is the environmentally superior alternative. If left in its current state, no new impacts would be introduced to the area. This alternative would result in the least impact to area roadways, aesthetics, the noise environment, air quality, biological resources and public services. However, the No Development Alternative would not implement the General Plan, GDP or SPA for the site. Further, this alternative would not accomplish any of the project objectives.

The Reduced Density Alternative could also be considered environmentally superior because it would result in less traffic than the proposed project and would be less dense than the proposed project. However, this alternative would not implement the General Plan, GDP or SPA for the site and would not accomplish any of the project objectives, particularly related to providing a diversity of housing types.

TABLE 10-1
PROPOSED PROJECT VS. ALTERNATIVES: COMPARISON OF ENVIRONMENTAL IMPACTS

Janua Araa	Drawaged Project	No Development	Existing Land Use Designation	Peduced Density Alternative
Issue Area Land Use, Planning and Zoning	The proposed project would be inconsistent with several General Plan policies. The proposed project would result in potentially significant, temporary land use conflicts between use of the proposed construction access road, vehicles using Wueste Road and recreational trail users. Grading for the optional pedestrian trail connection to the OTC and the temporary construction access road may conflict with the City's MSCP Subarea Plan relative to the potential for narrow endemics. As discussed in Section 5.0, all of these impacts would be mitigated	Alternative No impact.	No impact. If the optional temporary construction access road and trail are implemented, similar land use impacts would be associated with these features as the proposed project, and similar mitigation measures would be required.	Reduced Density Alternative Similar to the proposed project. If the optional temporary construction access road and trail are implemented, similar land use impacts would be associated with these features as the proposed project, and similar mitigation measures would be required.
Landform Alteration and Aesthetics	to below significance. The project would introduce a new source of light and glare which would be potentially significant. The temporary access road would result in a temporary visual/landform impact on views from Wueste Road north to the site. As discussed in Section 5.0, this impact would be mitigated to below significance.	No impacts.	Similar to the proposed project. If the optional temporary construction access road is implemented, similar temporary visual/landform impacts would be associated with this feature as the proposed project, and similar mitigation measures would be required.	Similar to the proposed project with respect to light and glare. Reduced scale and density as compared to the proposed project would blend with the existing residential community. If the optional temporary construction access road is implemented, similar temporary visual/landform impacts would be associated with this feature as the proposed project, and similar mitigation measures would be required.
Agricultural Resources	No impacts to agricultural resources would be associated with implementation of the proposed project.	No impacts.	Similar to the proposed project.	Similar to the proposed project.
Biological Resources	Potential direct impacts to narrow endemic plant species that may occur within the optional off-site trail and optional temporary	No impact	Similar to the proposed project. If the optional temporary construction access road and trail	Similar to the proposed project. If the optional temporary construction access road and trail are implemented, similar land use impacts would be

TABLE 10-1
PROPOSED PROJECT VS. ALTERNATIVES: COMPARISON OF ENVIRONMENTAL IMPACTS

Issue Area	Proposed Project	No Development Alternative	Existing Land Use Designation (Commercial - Tourist) Alternative	Reduced Density Alternative
	construction access road are considered significant. Potential indirect impacts to adjacent Preserve lands are also considered significant. As discussed in Section 5.0, these impacts would be mitigated to below significance.		are implemented, similar biological impacts would be associated with these features as the proposed project, and similar mitigation measures would be required.	associated with these features as the proposed project, and similar mitigation measures would be required.
Cultural Resources	Neither the proposed project nor the optional temporary access road or trail connection to the OTC would result in impacts to cultural resources.	No impact.	Similar to the proposed project. If the optional temporary construction access road and trail are implemented, there would be no impact to cultural resources.	Similar to the proposed project. If the optional temporary construction access road and trail are implemented, there would be no impact to cultural resources.
Geology and Soils	Impacts associated with slope instability would be potentially significant. Erosion during construction, although short-term in nature, could be significant without erosion control measures. Structures will be located over underground parking. Potentially significant impacts to foundations and structures could occur if expansive soils are encountered. Potential impacts resulting from other geological hazards such as seismic activity would be significant. Erosion could be associated with the temporary access road. As discussed in Section 5.0, these impacts were determined to be mitigated to below significance.	No impact.	Similar to the proposed project. If the optional temporary access road is constructed with this alternative, similar erosion impacts could occur.	Similar to the proposed project. If the optional temporary access road is constructed with this alternative, similar erosion impacts could occur.
Paleontological Resources	Impacts of the proposed project would be considered potentially significant as column drilling may unearth native, previously	No impacts.	Similar to the proposed project. If these impacts were significant, it is assumed that similar design	Similar to the proposed project. If these impacts were significant, it is assumed that similar design measures available to the proposed project could be

TABLE 10-1
PROPOSED PROJECT VS. ALTERNATIVES: COMPARISON OF ENVIRONMENTAL IMPACTS

Issue Area	Proposed Project	No Development Alternative	Existing Land Use Designation (Commercial - Tourist) Alternative	Reduced Density Alternative
	undisturbed soils. These impacts could be mitigated to a level below significance.		measures available to the proposed project could be incorporated to reduce impacts to a level below significance.	incorporated to reduce impacts to a level below significance.
Water Quality and Hydrology	Potential Impacts to water quality would occur both during construction and after the project is constructed. Impacts to water quality could occur from grading of the temporary access road. As discussed in Section 5.0, impacts would be mitigated to a level below significance.	No impacts.	Similar to the proposed project. If the optional temporary access road is constructed with this alternative, similar water quality impacts could occur as compared to the proposed project.	Similar to the proposed project. If the optional temporary access road is constructed with this alternative, similar water quality impacts could occur as compared to the proposed project.
Transportation, Circulation and Access	Impacts would occur at the project driveway/ Olympic Parkway intersection. In addition, a temporary traffic impact could occur at the intersection of the temporary access road and Wueste Road and the adjacent trail. As discussed in Section 5.0, these impacts would be mitigated to below significance.	No impacts.	This alternative would generate approximately 1,684 more ADT than the proposed project. It is assumed that similar design features could be implemented to reduce this impact to a level below significance.	Impacts would occur, however, traffic volumes from this alternative would be less than those generated by the proposed project. If these impacts were significant, it is assumed that similar design measures available to the proposed project could be incorporated to reduce impacts to a level below significance.
Air Quality	Impacts to air quality would be significant for the proposed project. During construction, ROC emissions would exceed the daily standard. Although construction-related emissions would not surpass PM ₁₀ thresholds, the project will generate nuisance dust and fine particulate matter. As discussed in Section 5.0, mitigation is provided to reduce construction emissions but the impacts remain significant and unmitigable. In and of themselves, the	No impact.	Similar to the proposed project with the exception that this alternative would generate more traffic which would result in an increase in vehicular emissions. If the temporary access road and trail were constructed with this alternative, they would generate similar air quality impacts as identified with the proposed project.	Similar to the proposed project with the exception that this alternative would generate less traffic which would result in a decrease in vehicular emissions. If the temporary access road and trail were constructed with this alternative, they would generate similar air quality impacts as identified with the proposed project.

TABLE 10-1
PROPOSED PROJECT VS. ALTERNATIVES: COMPARISON OF ENVIRONMENTAL IMPACTS

		No Development	Existing Land Use Designation	
Issue Area	Proposed Project	Alternative	(Commercial - Tourist) Alternative	Reduced Density Alternative
	temporary access road and trail would not generate significant air quality impacts. However, grading and site scraping associated with these features would contribute to the project's overall significant air quality impact.			
Noise	Potential exposure of future residents to exterior noise levels (from patio and balcony areas) greater than the City's allowable limit of 65 dB CNEL would be considered significant. Potential exposure to interior noise levels greater than the City's allowable limit of 45 dB CNEL would be considered significant prior to mitigation. In and of themselves, the temporary access road and trail would not generate noise. As discussed in Section 5.0, these impacts would be mitigated to below significance.	No impact.	Higher noise levels adjacent to Olympic Parkway are anticipated to be generated from a Commercial-Tourist use primarily due to significantly more traffic being generated by this alternative. In addition, the active nature of hotels, restaurants and/or meeting spaces would generate more onsite noise. If the temporary access road and trail were constructed with this alternative, they would not provide a significant noise contribution.	Lower noise levels adjacent to Olympic Parkway are anticipated to be generated from this alternative primarily due to the significantly less traffic that will be generated If the temporary access road and trail were constructed with this alternative, they would not provide a significant noise contribution.
Public Services and Utilities	The proposed project would result in an incremental increase in demand on public facilities if they are not provided commensurate with demand. The incremental contribution of solid waste, and demand on water and sewer service, parks, fire, police, emergency services, libraries and schools would be significant. Safety issues for recreational trail users directly exposed to crossing construction traffic are	No impact	This alternative would generate similar demands for police, fire, solid waste, parks and recreation as the proposed project, but would not have a demand on schools. Demand for potable water, sewage generation and demand on libraries would be reduced under this alternative. If the temporary access road and	This alternative would generate less demand on police, fire, parks and recreation, libraries and schools than the proposed project. This alternative would generate less solid waste and sewage, and would result in less demand for potable water. If the temporary access road and trail were constructed with this alternative, they would not result in an impact on public services. Safety issues related to the crossing of the access road at Wueste Road and adjacent trail would still occur.

TABLE 10-1
PROPOSED PROJECT VS. ALTERNATIVES: COMPARISON OF ENVIRONMENTAL IMPACTS

Issue Area	Proposed Project	No Development Alternative	Existing Land Use Designation (Commercial - Tourist) Alternative	Reduced Density Alternative
	considered significant. As discussed in Section 5.0, these impacts can be mitigated to a level below significance.		trail were constructed with this alternative, they would not result in an impact on public services. Safety issues related to the crossing of the access road at Wueste Road and adjacent trail would still occur.	
Hazards/Risk of Upset	No impacts related to hazards or risk of upset would occur as a result of the proposed project.	No impacts.	Similar to the proposed project.	Similar to the proposed project.